

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

DYLAN J. TREVINO, a minor, suing
by his next friend and guardian,
DIANA TREVINO, and DIANA
TREVINO, Individually,

Plaintiffs,

v.

BLITZ U.S.A., INC.; LAM 2011
HOLDINGS, LLC, f/k/a BLITZ
HOLDINGS, LLC; KINDERHOOK
CAPITAL FUND II, L.P.; BLITZ
ACQUISITION HOLDINGS, INC.;
BLITZ ACQUISITION, LLC; and
BLITZ RE HOLDINGS, LLC,

Defendants.

Civil Action No: 1:10-cv-00115

JUDGE HAYNES

JURY DEMANDED

AMPEK
This motion
is CERTIFIED
to all
11-21-11

JOINT MOTION FOR ADDITIONAL AMOUNT OF TIME

Defendants LAM 2011 Holdings, LLC f/k/a Blitz Holdings, LLC; Kinderhook Capital Fund II, L.P.; Blitz Acquisition Holdings, Inc.; Blitz Acquisition, LLC.; and Blitz RE Holdings, LLC (collectively, the "New Defendants") move the Court, pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure, for an additional amount of time to disclose fact witnesses and provide all information specified in Federal Rule 26(a)(1)(A).

On September 8, 2011, Plaintiffs moved the Court for leave to file an amended complaint to name the above-referenced entities as new defendants to the suit. [ECF No. 44] This suit was originally filed solely against Blitz U.S.A., Inc. on December 20, 2010. [ECF No. 1] The New Defendants were added about nine months later, when Plaintiff's motion for leave was granted on September 9, 2011. [ECF No. 45] Under an agreement between the parties, the New